

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 RCRA ACTIVITIES P.O. BOX A3587 CHICAGO, ILLINOIS 60690

ATTN: ROBERT B. MANCINI MUELLER BRASS CO. 1925 LAPEER AVE. PORT HURON, MI 48060 5/16/89

RE: EPA ID #: MD005357504

In response to your request of

the following information

has been updated:

DOOL AND FOOS HAS BEEN UPDATED ON INSTALLATION. #

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely,

Arthur S. Kawatachi Information Section

RCRA Program Management Branch

cc: State Agency

File

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: RCRA ACTIVITIES

Mr. William Roll
Mueller Brass Company
1925 Lapeer Avenue
Port Huron, Michigan 48060

RE: Interim Status Acknowledgement FACILITY NAME: Mueller Brass Company

USEPA ID No. MID005357504

Dear Mr. Roll:

UNITED STATE

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosure cc: Mr. Donald E. Kullander

	1 1 12	
SENDER:	Complete items 1, 2, and 3. Add your address in the "RETU reverse.	JRN TO" space on
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	NSULT POSTMASTER FOR	FEES)
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I have rece signatur	ived the article described abo	ve.
DATE AND S. ADDIE	SS (Complete only if requested)	POSTMARK 120
RECEIPT, REGISTERED INSURED AND CERTIFIED MAIL  6. UNABLE	E TO DELIVER BECAUSE:	CLERK'S INITIALS
F		☆GPO: 1979-288-848



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

OCT 13 1981

Mueller Brass Co. William Roll, Dir. of Eng. 1925 Lapeer Ave. Port Huron, MI 48060

RE: Hazardous Waste Permit Application-Incomplete Part A (M)0005357504) Facility Name (and EPA ID number) Facility Address

We have completed our review of your Part A RCRA permit application for the facility referenced above. The application was incomplete; therefore, we are returning it to you along with a checklist which indicates the missing items. Please complete all missing items marked with an asterisk (\*) on the application form, and return the form in time to reach this office by November 13, 1981. All other missing items marked on the checklist should be completed and may be forwarded to this office under separate cover by December 14, 1981.

All of these items are necessary in order for the U.S. Environmental Protection Agency to determine whether your facility qualifies for interim status. Once you receive interim status, your facility may continue operating under the interim status standards until such time as a Part B application is requested by USEPA. At that time, you will have up to six months to submit the Part B portion of the application and to show that you comply with the final detail technical standards.

Please note that some of your original entries on the forms may be changed. We have coded your forms to accommodate key punching for subsequent computer processing; all of our coding was done in blue ink only.

If you have any questions or wish to discuss the missing items on the checklist, please feel free to contact Allen Debus the reviewer of your application, at (312) 886-6162 or me at (312) 886-7449.

Sincerely yours,

Arthur S. Kawatachi Regional Project Officer

Enclosure

P.S. All missing items marked with an asterisk must be submitted to us with a cover letter signed by the appropriate certifying official (Item XIII on Form 1 and/or Item IX and X on Form 3) or his duly authorized representative.



#### ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER	•	MIDO	0535750	4	REACKNOWLE	DGEMENT
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INSTALLATION ADDRESS		1925 PORT	LAPEER HURON	AVE	ħ.	48060
EPA Form 8700-12B (4-80)		10/0	3/81			· · · · · · · · · · · · · · · · · · ·

Please go to the reverse of this form and provide the requested information.

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X. CERTIFICATION					
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WID002:22804

A STATE OF ACTOR AND A STATE OF





May 4, 1989

U.S. EPA Region V RCRA Activities P.O. Box A3587 Chicago, IL 60690

1- PART "A"

Attention: Ms. Sharron Kiddon 5HR

Subject:

Mueller Brass Company, 1925 Lapeer Avenue, Port Huron,

Michigan - EPA Identification No. MID-005357504

Dear Ms. Kiddon:

The purpose of this letter is a notification request to add hazardous waste stream codes D-001 and F-003 to the referenced facilities generator permit.

Please contact me at 313/987-4000 extension 602 if you have any questions.

Very truly yours,

MUELLER BRASS COMPANY

Environmental Engineer

RBM:st

MAY 1 0 1989

U. S. EPA, REGION V

RCRA-IMS U.S. EPA, REGION V

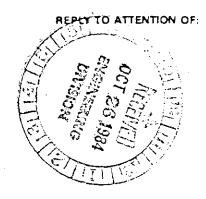


# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

OCT 2 3 1984

Mr. Ray M. Berra Director of Engineering Mueller Brass Company 1925 Lapeer Avenue Port Huron, Michigan 48090



Re: Mueller Brass Company M1D 005 357 504

Dear Mr. Berra:

The United States Environmental Protection Agency (U.S. EPA), Region V, has received Mueller Brass Company's (MBCo.) submittal of September 25, 1984, regarding ongoing review of MBCo. request for change in status from a Resource Conservation and Recovery Act (RCRA) treatment, storage and disposal facility to a generator only.

Our review of this request along with the information submitted on June 15, 1984, July 26, 1984, and September 25, 1984, in support of the request, has concluded the following:

- 1. Skims (RCRA hazardous waste DOO8) generated from MBCo. brass melting operations, which are stored in bins prior to shipment offsite for copper reclamation, comply with 40 CFR 261.6(a), and are not subject to regulations under 40 CFR 262 through 265, 270, 271 and 124.
- 2. Dust (baghouse wastes) captured from onsite air pollution control facilities at MBCo. is a RCRA hazardous waste by virtue of exhibiting EP toxicity for lead (D008) and cadmium (D006). U.S. EPA considers the bags, which collect and accumulate the dust, to comply with the definition of containers in 40 CFR 260.10. Since MBCo. ships this RCRA hazardous waste offsite in less than 90 days, it is not subject to RCRA Interim Status or Part B permit requirements for this activity. However, MBCo. is subject to all applicable requirements of 40 CFR 262, especially 40 CFR 262.34 with regard to the proper management of baghouse waste:

- 2.1 The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
- 2.2 While being accumulated onsite, each container is labeled or marked clearly with the words "Hazardous Waste";
- 2.3 Comply with the 40 CFR 265 Subparts C (Preparedness and Prevention), D (Contingency Plan), and 265.16 (Personnel Training); and
- 2.4 Comply with 40 CFR 265 Subpart 1 (Use and Management of Containers).
- 3. The "T-7 Clairifier" and sludge storage units comply with the exemption requirements in 40 CFR 264.1(g)(6) and are not subject to the requirements of 40 CFR Part 264.

Per the above discussion, MBCo.'s request for change in status from a RCRA treatment, storage and disposal facility, to a generator-only has been approved. As a result, the RCRA Part B application call-in date of October 22, 1984, is rescinded.

The retention of the U.S. EPA I.D. Number will allow MBCo. to be a RCRA generator of hazardous waste and to accumulate these wastes onsite in containers for less than 90 days. As stated, the regulations at 40 CFR Part 262, and other regulations referenced therein govern RCRA generator activities.

Should you decide in the future to initiate storage of RCRA hazardous waste for greater than 90 days, the issuance of a RCRA permit pursuant to 40 CFR Parts 124, 264 and 270 will be a prerequisite for such storage.

If you have any questions, please contact Mr. Timothy B. O'Mara of my staff at (312) 886-4023, for assistance.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

cc: Alan Howard (MDNR) (w/copy of incoming)

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. William Roll Mueller Brass Company 1925 Lapeer Avenue Port Huron, MI 48060

> Re: Mueller Brass Company MID005357504

Dear Mr. Roll:

By now you should have received an acknowledgement of our receipt of the Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program. Accordingly, this letter constitutes the next step in the formal process leading toward issuance or denial of an RCRA permit. Under the authority of 40 CFR 270.10 this is a formal request for submittal of Part B of the permit application for the above-referenced facility.

Enclosed is a copy of 40 CFR 270.14-270.29 which lists the items that constitutes a Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than October 22, 1984. Please uniquely number each page of the application including all attachments (maps, specifications, etc.). A certification statement identical to one stated in 40 CFR 270.11(d) must accompany the application and all additional submittals. Send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permit process as efficiently as possible. Consequently, I suggest you contact Mr. Timothy O'Mara of my staff at (312) 886-4023 as you begin preparing your application. Mr. O'Mara will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications without requiring any information beyond that which is necessary to make RCRA permit decisions.

P 371 346 046

## RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED— NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. William Roll
Mueller Brass Co.
Street and No.

1925 Lapeer Ave.
P.O., State and ZIP Code
Port Huron, MI 48060
Postage

Certified Fee

Special Delivery Fee

Return Receipt Showing to whom and Date Delivered
Return Receipt Showing to whom,

Date, and Address of Delivery
TOTAL Postage and Pees
Postmark or Date

PS Form 3800, Feb. 19

Complete items 1, 2, and 3. Add your address in the "RETURN T reverse. SENDER: 1. The following service is requested (check one.) X Show to whom and date delivered. D Show to whom, date and address of delivery. ... ☐ RESTRICTED DELIVERY Show to whom and date delivered... ☐ RESTRICTED DELIVERY. Show to whom, date, and address of delivery.\$. (CONSULT POSTMASTER FOR FEES) ARTICLE ADDRESSED TO: Mr. WM. ROll Mueller Brass Co. 1925 Lapeer Ave. Port Huron, MI 48060 ARTICLE DESCRIPTION: REGISTERED NO. | CERTIFIED NO. INSURED NO. P371346046 REGISTERED (Always obtain signature of addresses or agent). I have received the article described above.

O CENTIFIED MAII

6. UNABLE TO DELIVER BECAUSE:

ADDRESS (Complete only if requested)

CLERK'S

TGPO: 1979-288-848

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 270.10.

Information in the Part B permit application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (U.S. EPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. All incoming materials containing confidential business information should be sent in a double envelope—one envelope inside the other. The inner envelope is to be addressed to the docket control officer (DCO) with the following instructions: "to be opened only by the DCO". U.S. EPA will review business confidentiality claims under regulations in 40 CFR Part 2, and may later request substantiation of such claims. Please review these rules carefully before making a claim.

If you claim parts of the application as confidential please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We will coordinate review of the application with the Michigan Department of Natural Resources. It is possible that during the processing of your application the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case direct Federal processing will cease and the State in lieu of U.S. EPA will make the final determination on your application.

We look forward to receiving your Part B permit application.

Sincerely yours,

Waste Management Franch

Enclosure 40 CFR 270.14-270.29

Guidance for Permit Application Preparation

cc: Alan J. Howard,
Michigan Department of Natural Resources

5HW-13:WEMUNO:ap:6-6136:3-28-84

INITIALS TYPIST AUTHOR STU #1 STU #2 STU #3 TPS WMB CHIEF CHIEF

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7 3 4 5 1 (specify) Screw Machine Prod	ducts 7	(specify)	. 1
VIII. OPERATOR INFORMATION			
	A, NAME		B. Is the name listed in Item VIII-A also the
8 MUELLER BRASS CO	)		owner?  XYES INO
c. STATUS OF OPERATOR (Enter the approp.	riote letter into the answer box: if "Oth	zel" špacify I - D BUONE	ss area code & no.)
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B. UIC (Underground Injection of Fluids)	E. OTHER (specify)		
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C. RCRA (Hazardous Wastes)	E. OTHER (specify)	(specify)	
9 R 15 16 17 18 30	13 EG 472 ST	(apecity)	
Attach to this application a topographic map o	f the area extending to at least one	mile bound property boundaries	
the outline of the facility, the location of each treatment, storage, or disposal facilities, and e	n of its existing and proposed intal	ke and discharge structures, each of	its hazardous waste
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XII. NATURE OF BUSINESS (provide a brief descripti	on)>		
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XIII. CERTIFICATION (see instructions)			
I certify under penalty of law that I have personal attachments and that, based on my inquiry capplication, I believe that the information is to	of those persons immediately resp	onsible for obtaining the informat	ion contained in the
false information, including the possibility of fi	ine and imprisonment.	and the there are algumedic per	iarues roi suviriittilly
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Donald E. Kullander, Preside	ent finald Es	Kullander	Nov. 19, 198
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16 - 18 EPA Form 351		27	23	29	32 E 1 O		8 19	27	NTINUE O	Z9 -	32
PER A PROPERTY SEALES											

#### III. PROCESSES (continued)

- c. space for additional process codes or for describing other processes (code "T04"). For each process entered here include design capacity.
  - Line No. 1 Pickling & Electroplating rinse water treatment process using Ion Exchange and detoxification (including reduction, pH adjustment, clarification, dewater sludge with filter press). Ion exchange system design capacity 504,000 GPD Recirculation. Detoxification system design capacity 57,600 GPD with discharge to POTW (City of Port Huron).

Refer to attached Dwg. BL-25-13578, Flow Diagram.

#### IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B, ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

- 1. PROCESS CODES:
  - For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
  - For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
  - Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
  - 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual
- quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

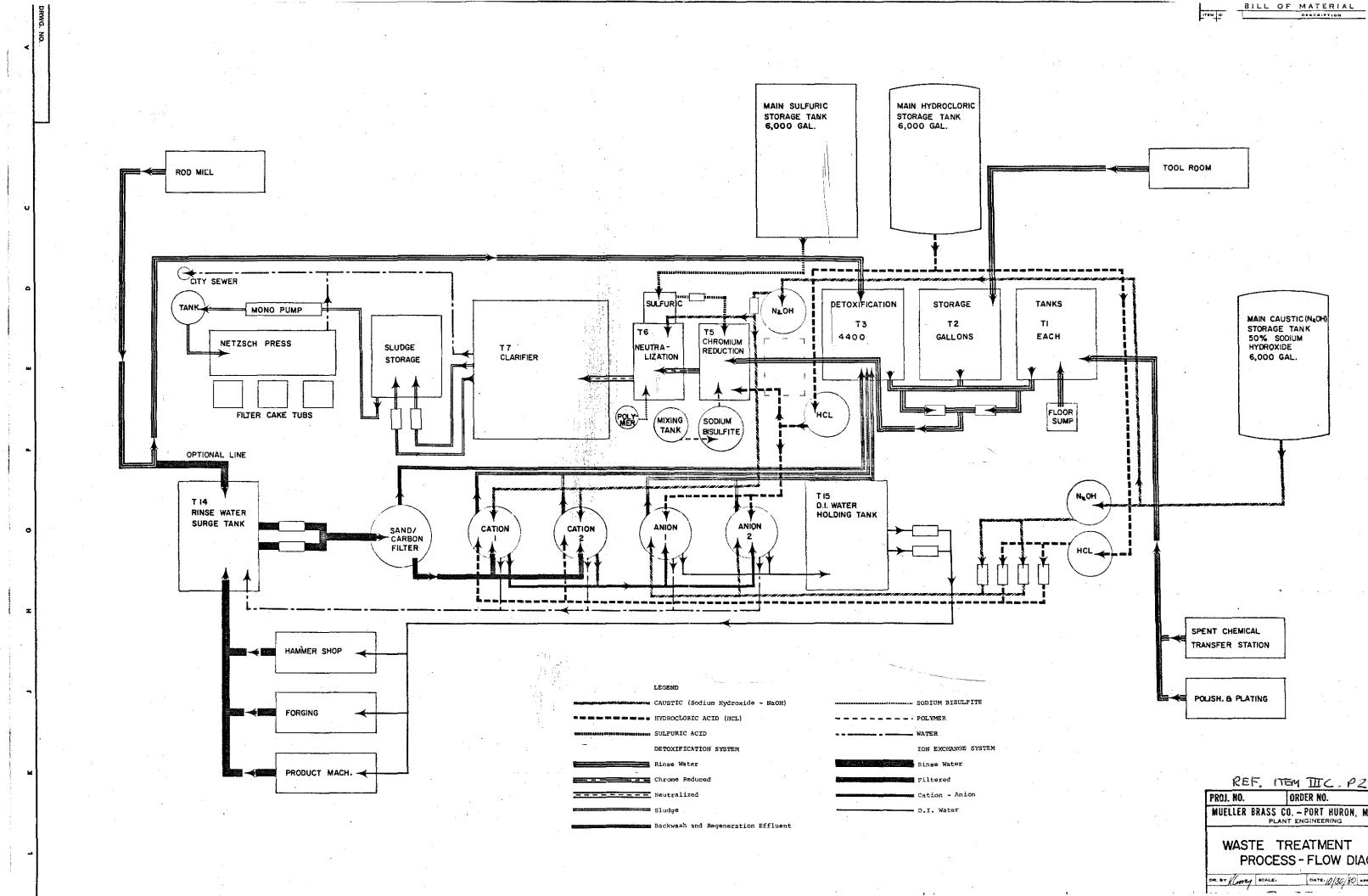
  In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

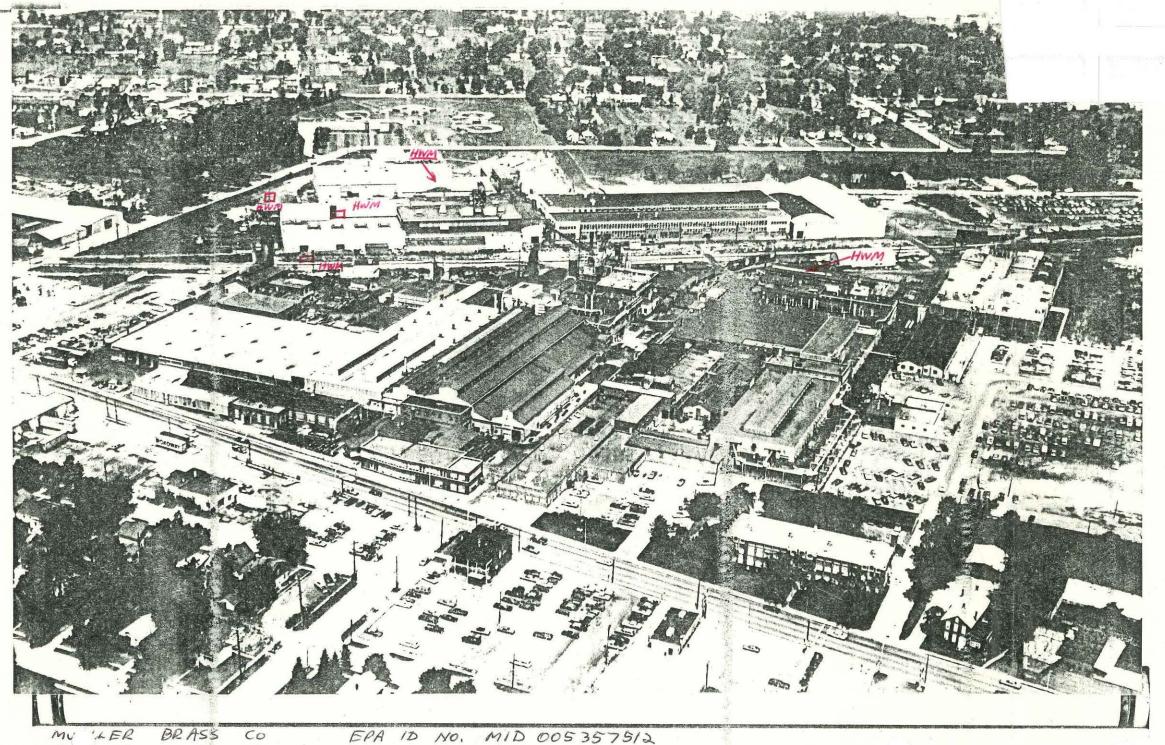
**EXAMPLE FOR COMPLETING ITEM IV** (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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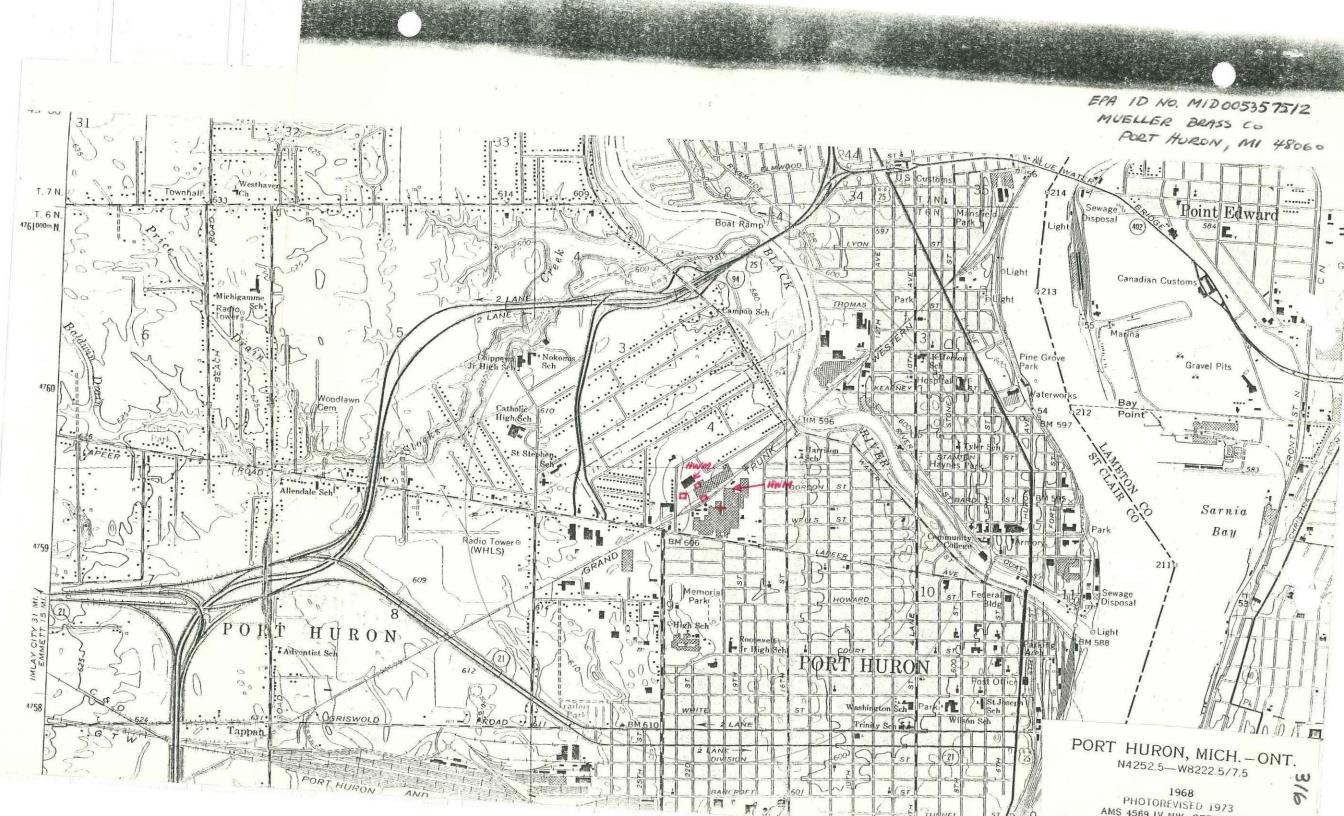
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V. FACILITY DRAWING	AND THE RESERVED AND ADDRESS.			
All existing facilities must include in the space provided on	page 5 a scale drawing of the facility (see instruc	tions for more detail).	MARKET STREET	MUNICIPIES.
VI. PHOTOGRAPHS	<b>国际企业的企业的</b>			
All existing facilities must include photographs (aer. treatment and disposal areas; and sites of future stores.)	<i>ial or ground—level)</i> that clearly delineate a	II existing structures	; existing stora ill	ge,
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MU LER BRASS CO PORT HURON, MI 48060 ITEM VI



#### ADDENDUM I

### Item $\overline{X}$ Existing Environmental Permits

- Ion Exchange and Detoxification System. State Certification No. F-562 (11/6/75) EPA Form 3300-3
- 2. Air Pollution Control Michigan Permit No.
  - 156-71 Chip Dryer
    323-73 Coal-fired Boiler #6
    213-74 Melting Furnace, AAF Baghouse
    3-75 Melting Furnace, Slug Cast Baghouse
    3-75 B Melting Furnace, Slug Cast Baghouse
    revision #10 Furnace.
    240-79 Aerofall Mill

MUELLER BRASS CO.
Port Huron, Mich. 48060
EPA I.D. No. 005357512

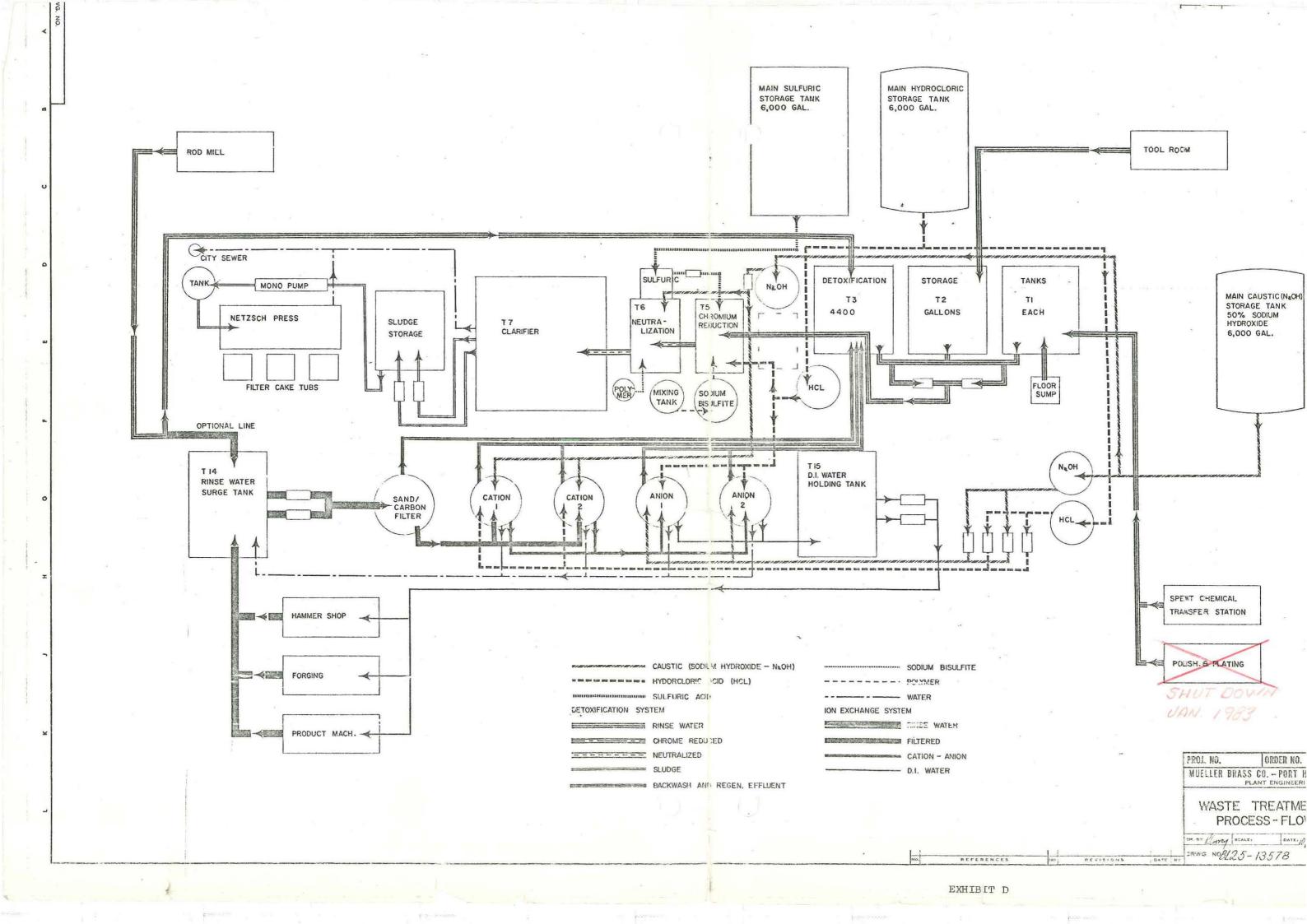




EXHIBIT A



EXHIBIT A



EXHIBIT B

PORT HURON, MICHIGAN 48060



Area Code 313

November 23, 1981

RCRA Activities Region V P. O. Box A3587 Chicago, Illinois 60690

Attention: Rebecca Strom

Reference: Hazardous Waste Permit Application

Mueller Brass Co., EPA ID No. MID 005357504

Telephone conversation with Mr. Robert B. Mancini

and E. L. Wefel on November 23, 1981.

Dear Rebecca:

As per your instructions we are enclosing original Form 1 for your records.

We will also change our copy of Form 3, Line 1, Process Code TO1 to read 504,000 GPD in place of (See 111C. Page 2) as you requested.

Robert B. Mancini Project Engineer

RECEIVED

RBM/vlt enclosure

cc: W. C. Roll

C. L. Otis

E. L. Wefel

NOV 25 b

WASTE MANAGEMENT BRANCH EPA, RECION V



Land in

#### MUELLER BRASS CO.

PORT HURON, MICHIGAN 48060



Area Code 313

October 20, 1981

RCRA Activities Region V P. O. Box A3587 Chicago, Illinois 60690-3587

Attention: Arthur S. Kawatachi

Regional Project Officer

Reference: Your Letter Dated October 13, 1981

Hazardous Waste Permit Application -

Incomplete Part A

(Mueller Brass Co., EPA ID No. MID005357504)

Enclosed is revised Part A RCRA permit application for the facility referenced above.

We believe this will complete your requirements. However, if additional information is needed, please let us know.

Very truly yours,

W.C. Roll

W. C. Roll

Director of Engineering

WCR/emg att/2

RECEIVED

001 26 1.

WASTE MER DESIGN DEANCH EPA, REGION V



PORT HURON, MICHIGAN 48060



MID 005 357 504

Area Code 313

September 25, 1984

## RECEIVED

OCT 0 3 1984

WMD-RAIU EPA, REGION V

RCRA Activities
Part B Permit Application
U. S. EPA, Region V
P. O. Box A3587
Chicago, Illinois 60690-3587

Attention: Mr. Timothy O'Mara

-

Reference: Mueller Brass Co.

MID 005357504 G, T5D, PA
Request for exemption from Part B
Requirement for change in status

to RCRA Generator Only.

Dear Mr. O'Mara:

We have received and reviewed Mr. William H. Miner's letter dated August 27, 1984 discussing the reference subject. Based on additional information brought out in his letter, we are resubmitting our request for reclassification under RCRA regulations to Generator Only.

In support of our determination as Generator Only, we have enclosed a letter dated September 25, 1984 with confirming documentation from T. R. Valentine and Associated, Inc., consulting engineers.

We feel that the enclosed information justifies our request to be classified as a Generator Only.

Very truly yours,

MUELLER BRASS CO.

Ray M. Berra

Director of Engineering

vlt

enclosure (s)

cc: D. G. Mason

D. F. Bringman

R. B. Mancini





Area Code 313

July 26, 1984

RCRA Activities
Part B Permit Application
U. S. EPA, Region V
P. O. Box A3587
Chicago, Illinois 60690-3587

Attention: Mr. Timothy O'Mara

Reference: Mueller Brass Company

MID 005357504 G,TSD, PA
Request for Exemption from
Part B Requirement for Change
in Status to RCRA Generator Only

RECEIVED

JUL 30 1984

WMD-RAIU EPA, REGION V

Dear Mr. O'Mara:

We received Mr. William H. Miner's letter, dated July 11, 1984, requesting additional information concerning the reference subject.

Therefore, we are submitting the following information which we believe will clarify the questions raised in his letter.

#### Bag House Dust Determination

It is our determination that dust captured from our air pollution control facility by definition is a dry "sludge" under 40 CFR Section 260.10 (a) (63), and, thereby would be a solid waste in accordance with Section 261.2 (a).

It is further determined that the "sludge" meets the definition of hazardous waste under Section 261.3, because it exhibits the characteristic of EP toxicity, Subpart C, Section 261.24, Table 1, and is not listed in Subpart D. The toxic contaminants causing it to be hazardous are EPA hazardous waste numbers D008 for lead and D006 for cadmium.

Based on the preceding determination, dust sold for reclamation by Mueller Brass Company is considered an RCRA hazardous waste, and is managed as such to comply with 40 CFR 261.6 (b).

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JUL 30 1984 WMD-RAIU EPA, REGION V



July 26, 1984 RCRA Activities Page 2

#### Chromium Plating Line Rinse Water and Treatment Facility

The length of time sludge is stored in the "sludge storage" unit is less than 24 hours since the filter press Moyno pump is continually drawing off sludge for de-watering when production departments are operating. It is also standard operating procedure to process the sludge in the sludge storage unit down to the low limit for any shut-down period exceeding 24 hours.

The length of time sludge (filter cake) is stored in the tubs is approximately 30 days, and always less than 60 days.

The appropriate definition which applies to the "T7 Clarifier", and the "sludge storage" unit are part of a "totally enclosed treatment facility" under 40 CFR 260.10 (70).

In conclusion we hope this correspondence satisfies the EPA concerns and we will be granted our request for exemption from Part B requirements. Thank you for your consideration.

Very truly yours,

MUELLER BRASS CO.

Ray M. Berra

Director of Engineering

vlt

cc: D. G. Mason

D. F. Bringman

R. B. Mancini



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

## 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-13

JUL 1 1 1984

Mr. Ray M. Berra Director of Engineering Mueller Brass Company 1925 Lapeer Avenue Port Huron, Michigan 48060

> Re: Mueller Brass Company MID 005 357 504

Dear Mr. Berra:

My staff has processed your request of June 15, 1984, for change in status for the subject facility from a Resource Conservation and Recovery Act (RCRA) hazardous waste management facility to a RCRA generator only. The following discussion summarizes our review.

Based on your letter of June 15, 1984, and information contained in our RCRA files on your facility, skims stored by Process Code SO3, Waste Pile, prior to shipment offsite for reclamation of copper, is in compliance with 40 CFR 261.6(a) and is not currently subject to regulations under 40 CFR 262, through 265, 270, 271 and 124.

The Environmental Protection Agency, Region V (U.S. EPA) needs additional information in order to comment on baghouse dust and chromium plating rinse water waste management practices. In order for U.S. EPA to comment on dust generated from your facility's baghouse operations, your determination or statement under 40 CFR 262.11 for this waste must be submitted.

If your analysis per 40 CFR 262.11 concludes that the dust is a solid waste only, the handling of such waste is not regulated by RCRA. If the dust is a RCRA hazardous waste, then for purposes of use, reuse, recycling or reclamation, the dust is considered a RCRA hazardous waste sludge pursuant to 40 CFR 260.10 and 40 CFR 261.6(b). The storage and treatment of such RCRA hazardous waste prior to its use, reuse, recycling or reclamation is subject to the following:

- Notification requirements under Section 3010 of RCRA
- . 40 CFR 262 and 263
- Applicable provisions of Subparts A through L of 40 CFR 265

 Parts of 40 CFR 270 and 124 with respect to storage facilities

Regarding the chromium plating line rinse water, two issues need clarification by you before U.S. EPA can comment on the applicability of 40 CFR.

- Length of time sludge is stored in "sludge storage" unit and "filter cake tubs" as illustrated on the Waste Treatment Process Flow Diagram submitted on June 15, 1984.
- . The appropriate definition from 40 CFR 260.10 (tank, open/closed or surface impoundment) which applies to the "T7 Clarifier" and the "sludge storage" unit.

If you have any questions on this matter, please contact Mr. Timothy B. O'Mara of my staff at (312) 886-4023 for assistance.

Sincerely,

William H. Miner, Chief

Technical, Permits and Compliance Section

cc: Alan Howard, MDNR

PORT HURON, MICHIGAN 48060



June 15, 1984

RCRA Activities
Part B Permit Application
U. S. EPA, Region V
P. O. Box A3587
Chicago, Illinois 60690-3587

Attention: Mr. Timothy O'Mara

Reference: Mueller Brass Company

MBCO. MID 005357504 6 TSD PA

Request for exemption from

Part B Requirement

Dear Mr. O'Mara:

Following up our telephone conversation of June 13, 1984, this letter is intended to formally request that the reference facility be reclassified as a generator only. There have been revisions to our Part A application as originally submitted to the EPA, and they are summerized and documented, as follows:

Process Code S03, Waste Pile, refers to skims generated from our brass melting operation. The skims are collected and stored inside in bins as shown in photograph, Exhibit A, for shipment to a refinery for reclamation of the copper content which assays at approximately 40%.

Therefore, the skims are not considered a waste by MBCo., but a reclaimable valuable material for recycling.

Dust generated from our baghouse operations is collected in sealed weather proof bags, manifested and sold for reclamation, at a net positive gain, for zinc content. The bag collection system is shown in Exhibit B. Bags are stored for less than 90 days from accumulation start date.

We also shut down our plating department for customer service in January of 1983. Cyanide plating solutions, tanks and piping were manifested and disposed of, as shown in Exhibit C, Michigan Manifest Number MIO163296.

MBCo. has a small one-man hand operated chromium plating line for internal tool plating use. Approximately 200 gallons of rinse water is generated per day from this line, and is treated in MBCo's Waste Water Treatment Plant. The 200 GPD represents about .08% of the total volume, 250,000 gallons, treated per day.

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JUN 1-8 1984

WMD-RAIU EPA, REGION V



Page 2 June 15, 1984 RCRA Activities

The Tool Room chromium bearing rinse water is compatible with rinse waters from brass, copper and aluminum cleaning operations being treated from other departments.

MBCo's Waste Water Treatment Plant consists of an Ion Exchange System for cleaning up rinse waters and recycling the water for conservation, and a Detoxification System for chromium reduction, neutralization, precipitation, solids separation and dewatering.

Attached is revised Drawing Number BL-25-13578 flow diagram, Exhibit D.

Please let us know if you require any further information.

Very truly yours,

MUELLER BRASS CO.

Ray M. Berra

Director of Engineering

vlt

Attachment (s)





February 29, 1984

RCRA Activities EPA, Region V P. O. Box A-3587 Chicago, Illinois 60690-3587

Attn: Biennial Report

Dear Sirs:

Enclosed please find copies of the completed "Hazardous Waste Treatment, Storage, and Disposal Facility Report for 1983", and the "Hazardous Waste Generator Report for 1983", for our Port Huron facility, Identification No. MID005357504.

Also, enclosed is a copy of the completed "Hazardous Waste Generator Report for 1983", for our Marysville facility, Identification No. MID005357520.

Sincerely,

MUELLER BRASS CO.

W. C. Roll

Director of Engineering

vlt

Enclosures (3)

#### ENVIRONMENTAL PROTECTION AGENCY

### FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983. Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS	Explain your non-regulated status in the space below.
See instructions before completing this section.	* * *
This facility did not treat, store, or dispose of	
regulated quantities of hazardous waste at any	
time during 1983 □	
Please print/type with elite type (12 characters per inch)	
II. FACILITY EPA I.D. NUMBER	This Facility's Non-Regulated Status is Expected to Apply:
T/A C G	☐ For 1983 Only ☐ Permanently
F M I D 0 0 5 3 5 7 5 0 4   1	Other (explain in comment section)
1 2 13 14 15	iii comment section)
	C303 ENTRY (OFFICIAL USE ONLY):
III. NAME OF FACILITY	
M U E L L E R   B R A S S   C O.	errinia arreceratio <mark>cal</mark>
30	69
IV. FACILITY MAILING ADDRESS	
3 1 9 2 5   L A P E E R   A V E	45
Street or P.O. Box	10
4 P O R T   H U R O N	M I 4 8 0 6 0
15 16	41 42 47 51
City or Town	State Zip Code
V. LOCATION OF FACILITY (if different than section IV abo	ove)
[5]	45
Street or Route number	
[6]	
15 16	41 42 47 51  State   7   Code
City or Town	State Zip Code
VI. FACILITY CONTACT	
	45
Name (last and first)	
The state of the s	ES FOR FACILITIES
3 1 3 - 9 8 7 - 4 0 0 0  \$   1 1	10 000 \$ 1 , 1 , 1 , 31
Phone No. (area code & no.)  A. Cost Estimate for F	22
Thome not faith code of not	and Maintenance (disposal facilities only)
VIII. CERTIFICATION  I certify under penalty of law that I have personally examined and am famil documents, and that based on my inquiry of those individuals immediately submitted information is true, accurate, and complete. I am aware that there including the possibility of fine and imprisonment.	responsible for obtaining the information, I believe that the eare significant penalties for submitting false information,
W. C. Roll Director of Engineering	William Poll 2/29/84

# Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendary	ar year ending December 31, 1983.
Date rec'd: Rec'd by:	XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)
IX. FACILITY'S EPA I.D. NO.	Mueller Brace Co
F M I D O O 5 3 5 7 5 0 4 1	ON-SITE M
1 2 13 14 15	XII. GENERATOR ADDRESS
X. GENERATOR'S EPA I.D. NO.	
GMID0053357504	
16 28	
XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31	1983 (complete this section only once for your facility)
S01 L L L L L L S02 L L L	2  2  LT   S03
S04 L I I I I I I I L L AMOUNT OF WASTE UOI	S05
XIV. WASTE IDENTIFICATION	B. EPA Hazardous   C.   in some of the state
Sequence # A. Description of Waste	B. EPA Hazardous  Waste No. Handling (see instructions)  Method  D. Amount of Waste
Combined rinse waters from pklg	D 0 0 7 D 0 0 8
29 32 aluminum parts Combined corrosive mixt. from	41 44 45 48 49 51 52 60 61
combined corrosive mixt. from 2 ion exch. regeneration & brass cleaning & plating rinse waters Corrosive mixt. caustic spent 3 acids incl. Mitric, sulfuric,	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$
Corrosive mixt. căustic spent acids incl. Mitric, sulfuric, hydrochloric & sod. dichromate	$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$
from brass clng. lines.  Spent.sodium cyanide.sol. from cleaning copper fittings.	P 1 0 6 1 1 1
	T <sub>1</sub> O <sub>1</sub> 1  33 T
5	
6	
7	
8	
9	
10	
11	
12	
XV. COMMENTS (enter information by section number—see in	nstructions)
Section XIV - Line #1 - C Handling	method TO4 Ion Exchange Treatment System

C. Handling method T04 Ion Exchange Treatment System.

Section XIV - Lines #1, #2 and #3 - 171 tons of filter cake generated from waste treated in 1983 by Waste Water Treatment Plant for landfill disposal.

#### **ENVIRONMENTAL PROTECTION AGENCY**

### GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983. Read All Instructions Carefully Before Making Any Entries on Form

#### I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

- 1 Non-handler
- 2 Small Quantity Generator
- 4 Exempt

explanation of codes).	5 Beneficial Use 9 Closed
	his Installation's Non-Regulated Status is Expected to Apply:
II. GENERATOR'S EPA I.D. NUMBER	☐ For 1983 Only ☐ Permanently
T/A C   F   M   I   D   O   O   5   3   5   7   5   O   4   1   1   1   1   1   1   1   1   1	C303 ENTRY (OFFICIAL USE ONLY):
III. NAME OF INSTALLATION	C303 ENTRY (OFFICIAL USE ONLY)
MUELLER BRASSICO	
	<b>我们就在"我看到我们的</b> ",他们也是我们的一个不是一个。
IV. INSTALLATION MAILING ADDRESS	
3 1 9 2 5   L A P E E R   A V E	45
Street or P.O. Box	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
[4]P O R T   H U R O N	M  I 4 8 0 6 0   41 42 47 51
City or Town	State Zip Code
V. LOCATION OF INSTALLATION (if different than section IV	above)
V. LOCATION OF INSTALLATION (if different than section IV	above)
V. LOCATION OF INSTALLATION (if different than section IV  15	above)45
15	above) 45
[5]	above)  45  41 42 47 51  State Zip Code
5	45 45 41 42 47 51
5	45 45 41 42 47 51
15 16	45 45 41 42 47 51
15 16   Street or Route number   6	45 45 41 42 47 51
15 16	45 45 41 42 47 51
15 16   Street or Route number   6	45 45 41 42 47 51
Street or Route number   Street or Route num	45  41 42 47 51  State Zip Code  45  45  46  47  48  48  49  49  49  49  49  49  49  40  40  40

Signature of Authorized Representative

Title

Print/Type Name

Date Signed

#### E. . . RONMENTAL PROTECTION AGENCY

### Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

 Date rec'd:
 Rec'd by:

 VIII. GENERATOR'S EPA I.D. NO.
 T/A C

 Image: Comparison of the comparison of t

 FACILITY NAME (specify facility to which all wastes on this page were shipped)

Foreign shipment - See Section XIV

### X. FACILITY'S EPA I.D. NO.

M | I | D | O | O | 5 | 3 | 5 | 7 | 5 | O | 4 | 16 28

#### XI. FACILITY ADDRESS

R. R. #1 Corunna, Ontario Canada NON 1GO

#### XII. TRANSPORTATION SERVICES USED

Tricil (Sarnia) Limited - EPA ID No. MIT270019904 Environmental Management Div. of En Manco Corp. EPA ID No. MID 980681621.

XIII. W	AS	TE IDENTIFICATION	<u> </u>	) J	(	· EDA L	lazardous				3545-ER	<del>2007</del> 92 <del>946</del> 0				Unit of
Sequence #	tine ‡	A. Description of Waste	B. DOI Hazard	code		Wast (see inst	e No. tructions)		D	Amo	oun	t of	Wa	iste	) ;	E. Unit o Measure
1 1 1 1 1 1 2 2 3 3 3 3 3 3 3 3 3 3 3 3	1	Waste Water Treatment Plant filter cake.	<u>1</u>	<u>5</u>	35 D I	010138	D <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 7 39 42 47 50	51						<sub>1</sub> 7 <sub>1</sub> 3		T
Sp. 75	2	Corrosive sulfuric acid, spent from brass and copper cleaning process.	0_	2		0; 0; 2 0; 0; 8	D101017						ı	<sub> </sub> 2 <sub> </sub> 3		T
	3	Corrosive waste sodium dichromat solution from brass and copper cleaning operation.		2	D	01017		1	t				1	<u> 2  </u> 1		Т
	4	Spent vibratory cleaning compoun for brass parts - contains water citric acid and soap.	d L	5	D.	8 <sub>1</sub> 0 <sub>1</sub> 0						<u> 1</u> 6	16	<u> 17   :</u>	3	P .
	5	Poison B Barium chloride heat treating salt - discontinued use.	1	8	D <sub>I</sub>	01015			L			12	.8 _	0 0		P _
	6	Solids from brass and copper cleaning operation.	1	5	D l	0 0 7						<u> </u>	<u>.</u> 4	<sub>1</sub> 2 <sub>1</sub> 5		P
	7		1									l	1_			
	8							_ 1	· I	1			ı	1		
	9		, ,				] ] ]			J			1	1 1		
e y e e e e	10							1	1				]			-
	11		l							— <u>—</u> 		L				
	12		1											1 1		

#### XIV. COMMENTS (enter information by section number—see instructions)

Section IX and XI - Tricil (Sarnia) Limited EPA ID No. MIT 270019904 (Foreign Facility)

Section XIII - Line #3 - Solution is 10 0z per gallon Sodium Dichromate plus 4% by volume sulfuric acid - remainder water.

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by: VIII. GENERATOR'S EPA I.D. NO.

M | I | D | O | O | 5 | 3 | 5 | 7 | 5 | O | 4 | 13 | 14 | 15

X. FACILITY'S EPA I.D. NO.

M<sub>|</sub>I |D<sub>|</sub>O |4 |8 |0 |9 |0 |6 |3 |3 |

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal, Inc.

#### XI. FACILITY ADDRESS

49350 N. Service Drive Belleville, MI 48111 Site #2

#### XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental Services, Inc. - EPA ID No. MID 087478574.

XIII. W	ASTE IDENTIFICATION	o To	, C. EPA Hazardous		Jnit of asure
	A. Description of Waste	B. DOT Hazard	Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
<u>    1   1   1   1   1   1   1   1   1  </u>	Waste Water Treatment Plant Filter Cake.	1 <sub>1</sub> 5	D <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 6 D <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 7 35 D <sub>1</sub> O <sub>1</sub> O <sub>3</sub> 8 39 42 43 46 47 50		<u>т</u> 60
200000000000000000000000000000000000000	2	<u> </u>	1 1 1 1 1 1		6U
	3				——
	4	1			
	5				
	6	!			
	7				
	8				
	9	1			
	10				
	11				200 200 200 200 200
	12				

XIV. COMMENTS (enter information by section number-see instructions)

This report is for the calendar year ending December 31, 1983.

Date rec'd:	Rec'd by:
VIII. GENERATOR'S EP	
M I D 0 0 5 3 5	T/A C   7   5   0   4   14   15   7   7   7   7   7   7   7   7   7
1 2	13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Eagle Picher

X. FACILITY'S EPA I.D. NO.

NED000061105550

#### XI. FACILITY ADDRESS

East Highway 8 Fairbury, Nebraska 68352

#### XII. TRANSPORTATION SERVICES USED

A & J Trucking, Inc. EPA ID No. IAD 05506653.

	STE IDENTIFICATION	L De	. C. EPA Hazardous		nit of sure
755	A. Description of Waste	B. DOT Hazard	Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1 1 1 2 32 32	Baghouse dust from brass casting air pollution control system.	ng 1 <sub>4</sub> 5 33 34	D   O   O   18   D   O   O   7   35   38   39   42   D   O   O   6   43   43   46   47   50   5	1 1 1 1 1 5 19	T 50
	2		] ] ] ]	1 1 1 1 1 1 1	
	3				
	4				
	5				
	5	!			
	7				<u>.</u>
	9				
	0				
	1				
	2				

XIV. COMMENTS (enter information by section number-see instructions)

Section XIII - Line #1 - Baghouse dust is sold for reclamation at a net positive gain.

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by: VIII. GENERATOR'S EPA I.D. NO.

X. FACILITY'S EPA I.D. NO.

M|I|D|0|9|1|6|0|5|9|7|2

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Gold Shield Solvent

#### XI. FACILITY ADDRESS

12886 Eaton Ave. Detroit, Michigan 48227

#### XII. TRANSPORTATION SERVICES USED

Gold Shield Solvent - EPA ID No. MID 091605972.

#	TE IDENTIFICATION	107	ם פ	<u> </u>	C. EP	ΆН	azardo	us						T-Les		– Jnit of	Measure
Sequence #	A. Description of Waste	B. DOT	197 COC		(see	vaste insti	e No. ruction:	s)		D. <i>A</i>	۱mc	unt	of	Was	te	<u>Г</u>	Me
29 32 1	Waste containing Trichlorethylen	e 1 33		F 35 43	(see O <sub>1</sub> (	38   46	39	42 1 50	51				<u> 19</u>	18 ]	4 10	F	1000
2										1		_1_	ļ				- THE STATE OF THE PERSON OF T
3									1								
4								1			_1_				1		
5						 	L						J	1	<u>l</u> _		**************************************
6			L			<u> </u>			1					11	l_		
7													1				
8						<u> </u>			1	ı	ŀ						200
9			<u>.                                    </u>					1			1			1			
10			L			<u> </u>							1	<u>.                                    </u>			
11			1		1.			1		1	1		1	1 1			
12				_			i	<u> </u>		ı	1						

XIV. COMMENTS (enter information by section number-see instructions)

Secton XIII - Line #1 - Waste containing Trichlorethylene is sold for reclamation at a net positive gain.

#### RONMENTAL PROTECTION AGENCY

### Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 7 5 0 4 13 14 15

Stoller Mii

this page were shipped)

X. FACILITY'S EPA I.D. NO.

S C D 0 4 6 5 0 3 1 3 2

XI. FACILITY ADDRESS

P. O. Box 489 Revenel, SC 29470-0489

IX. FACILITY NAME (specify facility to which all wastes on

XII. TRANSPORTATION SERVICES USED

Grand Trunk R. R. EPA ID No. MIT 270010838.

XIII. W	AS #	TE IDENTIFICATION	<u> </u>	c c		r F	PΔ F	lazardo									Unit of
Sequence #	ā	A. Description of Waste	8 0	Mazard		(see	Wast inst	e No. ruction	s)	ا	). A	mo	unt	of	Was	te	E. Unit of Measure
	1	Baghouse dust from brass casting air pollution control system.	1 33	1 <u>5</u>	35 20 43	0	0 8 01 6 46	D  0   39   47	0   7   42   50	51			Щ_	1	11	8   1 59	<u>т</u> 60
	2		22	1		- [					1	-	L	L			
	3			L							1			1		l.	
	4			L				1 1						L	<u></u>		
	5			l	Щ							_1			<u> </u>		
	6			1						1				1	<u></u>		
	7			<b>.</b>		_					L		<u></u>		1 1	L	
	8			L		L	L				ı	1		L	<u>L</u>	_1_	
	9			Į		1				1	. 1	ı		Į	<u>]</u>	1	
	10			<u> </u>					1	1							
	11			ı							1	1		1			
	12			I		L					1.			1	l L	_1	

XIV. COMMENTS (enter information by section number-see instructions)

Section XIII - Line #1 - Baghouse dust is sold for reclamation at a net positive gain.

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.  T/A C	Date rec'd:Rec'd by:	
Annual An		
THE POST OF STREET	MIIDO05357504	

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem-Met Services, Inc.

X. FACILITY'S EPA I.D. NO.

M|I|D|0|9|6|9|6|3|1|9|4| 16 28

#### XI. FACILITY ADDRESS

18550 Allen Road Wyandotte, MI 48192

### XII. TRANSPORTATION SERVICES USED

Chem-Met Services, Inc. EPA ID No. MID 096963194 Paul O. Sellars Co. EPA ID No. MID 980793350

XIII. WAS	TE IDENTIFICATION	L P	, C. EPA Hazardo	lis .					ure
Sequence # =	A. Description of Waste	B. DOT Hazard code	Waste No. (see instruction	s)	D.	Amour	nt of V	Vaste	E. Unit of Measure
20	Corrosive sulturic acid, spent from brass and copper cleaning operation.	22 24	D <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 2 D <sub>1</sub> O <sub>1</sub> 0 35 38 39 43 46 47	0 <sub>1</sub> 8  42  50	51	<u> </u>	11_	<sub>1</sub> 5 <sub>1</sub> 0	T 60
2	Corrosive sludge, acid from brass & copper cleaning operation	012	D, 0, 0, 2 D, 0,				1	 L_[0	P
3				1					% (98)
4				1	1	<u> </u>	1 1	1.1.	
5						LLL			2
6						1 1 1			
<u> </u>						<u> </u>	1 1	_1_1	2
8									
9							1 1		
10		<u> </u>			L_				
11									
12		1			1	l Li		_!	

XIV. COMMENTS (enter information by section number—see instructions)

#### RONMENTAL PROTECTION AGENC

### Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by: VIII. GENERATOR'S EPA I.D. NO.

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Nelson Industrial Services, Inc.

X. FACILITY'S EPA I.D. NO.

M|I|D|0|9|8|0|1|1|9|9|2|

#### XI. FACILITY ADDRESS

12345 Schaefer Hwy. Detroit, MI 48227

#### XII. TRANSPORTATION SERVICES USED

Nelson Industrial Services, Inc. - EPA ID No. MID 098011992.

XIII. WAS	TE IDENTIFICATION	52 5	ı C. EPA Hazard	ous i					it of ure
Sequence #	A. Description of Waste	B. DOT Hazard	Waste No. (see instructio	ns)		Amou	nt of '	Waste	E. Unit o
1 1 1 1 1 1 1 1 29 32	Poison B - Waste sodium cyanide plating solution.	1 <sub>1</sub> 8	Fi 0i 0i 7 Di 0 35 Pi 1i 0i 6 Pi 0 43 46 47	1013 1219 50	<u> </u>	1	12	5 (1 <u>18</u>	
2	Poison B - Plating tanks & pipin contaminated with cyanide sludge	3 1 8	F <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 8			1	L. I	8   5   0	P _
3	Waste lead fluoborate solids.	$1_{ert} 4$	D <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 8			lL.	L	3 16 15	P _
4					1				
5		1				1 1	l 1		
- 6		ı		<u>i</u> ,	!	1 1			
7					<del></del>	1 1	1 1		
8							<del></del>	1 1	
9				1 1	<del>-   -  </del>	<u>.                                      </u>	<del>-  ,  </del>		
10		,				1 1	<del>-                                    </del>		
11		,			<u>-</u>		l I		
12		ì			<del>- 1</del>				100

XIV. COMMENTS (enter information by section number-see instructions)

#### **RONMENTAL PROTECTION AGENC'**

### Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by-	
VIII. GENERATOR'S EPA I.D. NO.	
MII DO O D S 3 5 7 5 0 4	a market street
1 2 13 14 15	10000

X. FACILITY'S EPA 1.D. NO.

M|I|D|0|5|7|0|0|2|6|0|2| 16 28 IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

#### XI. FACILITY ADDRESS

27140 Princeton Ave. Inkster, MI 48141

#### XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental Services EPA ID No. MID 087478574 Environmental Waste Control EPA ID No. MID 057002602 Ray Molder, Inc. EPA ID No. MID 052042959

XIII. WA	STE IDENTIFICATION	5z	C. EPA Hazardous	ure (
Sequence #		8. DOT Hazard code	Waste No. (see instructions) D. Amount of Waste	Measure
29 32	Spent vibratory cleaning compoun for brass parts - contains water citric acid and soap.	d 1 <sub>1</sub> 5 33 34	· · · · · · · · · · · · · · · · · · ·	60
2	Wibratam alada form alami'	1 <sub>1</sub> 5	D; 0; 0; 8 ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;	)
3	Waste containing grease, oil, water, dirt & metal fines from	1 5	D <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 8	)
4	Contact water & sludge from Casting Shop molds cooling system	11 <sub>]</sub> 5	D101018   1   1   1   1   1   1   1   1   1	r
5	Spent soap solution for drawing copper & brass tube shells.	1,5	D <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 8	) 
· · · · · · · · · · · · · · · · · · ·				200 200 200 200 200 200 200 200 200 200
7				75 75 75 75 75 75 75
8				
<u> </u>				
11				
1	1			
1	2			200 E

XIV. COMMENTS (enter information by section number-see instructions)

#### 'IRONMENTAL PROTECTION AGENC'

### Generator Biennia: Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

S 11.	Date rec'd: Rec'd by:	IX. FACILITY NAME (specify facility to which all wastes or
	VIII. GENERATOR'S EPA I.D. NO.	this page were shipped)
	T/A C  M I D 0 0 5 3 5 7 5 0 4	
	1 2 13 14 15	XI. FACILITY ADDRESS
		ATT ACIETY ADDRESS
	X. FACILITY'S EPA I.D. NO.	
. 70	16 20	

XII. TRANSPORTATION SERVICES USED

XIII. WAS	STE IDENTIFICATION	L E	. C. EPA Hazardo	us .					iit of ure
Sequence # =	A. Description of Waste	B. DOT Hazard	Waste No. (see instruction	s)	D	. Amo	ount o	f Waste	E. Unit o
1 1 1 1 1 1 29 32	Waste Water Treatment Plant filter cake.	1 <sub>4</sub> 5	DI OI OI 6 DI OI 35 38 39 DI OI OI 8 1 1 43 46 47	0+7 42 50	51			1 1 2	T 60
2	Baghouse dust from brass casting air pollution control system		D <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 8 D <sub>1</sub> O <sub>1</sub>	0,7		1		1 110	T
3	Waste containing trichlorethylen from brass & aluminum degreaser operation.	e 1 <sub> </sub> 3	F <sub>1</sub> O <sub>1</sub> O <sub>1</sub> 1	1	_ L_			151010	P
4					1		1 1		
5	·				1.	1			
6		-				1 1	1 1		ě
7	_	!					1		77
8		l						1 1 1	
9						_11_			
10   F   L		_				[			
11									
12				<u>l</u>			[ ]		

XIV. COMMENTS (enter information by section number—see instructions)

1983 Generated - Stored on-site less than 90 days as of December 31, 1983.

Tear out he